## VA Grant & Per Diem

# Fiscal Year 2022 Transitional Housing Grants

Per Diem Only Models
Special Need
Transition in Place

# **Grant Recipient Guide**



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## VA Grant & Per Diem (GPD) National Program Office

#### **Contact Information**

General Operational Questions: <a href="mailto:GPDGrants@va.gov">GPDGrants@va.gov</a>

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#### **GPD Web Resources**

GPD National Site: https://www.va.gov/HOMELESS/GPD.asp

GPD Provider Site: <a href="https://www.va.gov/HOMELESS/GPD">https://www.va.gov/HOMELESS/GPD</a> ProviderWebsite.asp

GPD Fiscal Site: <a href="https://www.va.gov/HOMELESS/GPD">https://www.va.gov/HOMELESS/GPD</a> Fiscal.asp

GPD Per Diem Rate Site: https://www.va.gov/HOMELESS/GPD ProviderRate.asp

GPD Provider Training Site: https://www.va.gov/HOMELESS/GPD Provider Training.asp

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#### **Overview**

Welcome to Fiscal Year 2022! GPD is a true partnership between VA and community providers across the country. The GPD National Program Office applauds the collaborations that GPD grantees and VA teams cultivate together to build robust service delivery networks for the Nation's most vulnerable Veterans. Thank you for the valuable work you do every day to help end Veteran homelessness.

In general, this guide was developed to give grantees and VA staff an overview of the GPD program, from operationalizing a new grant to measuring performance. For new Special Need (SN) grantees, this guide contains information essential for understanding the GPD framework, and it explains the roles both grantees and VA Medical Centers (VAMC) GPD liaisons have in ensuring optimal service delivery to Veterans served by GPD. Per Diem Only (PDO) grantees and/or Transition in Place (TIP) grantees, please thoroughly review the material in this guide. It incorporates program and regulatory shifts that occurred over the past year.

The information in this guide is to be used for reference and general guidance. It does not supersede any national GPD regulations, other statutes, or governing laws. GPD grantees are required to be aware of and comply with any federal, state, or local laws. Links to the GPD regulations—as well as other relevant regulatory and statutory guidance—may be accessed on our GPD public-facing websites.

#### **Essential Points**

- Effective July 2021, 38 CFR Part 61 states supportive housing "is designed to…facilitate the movement of homeless veterans to permanent housing as soon as possible but no later than 24 months…"
- FY: The federal FY runs annually from October 1 through September 30
  - o Grant reporting also coincides with this schedule

#### • Electronic Grants Management

- In FY 2022, the GPD National Program Office is using <u>SmartSimple</u> for grant submissions and ongoing grant management
- It is important that grantee staff have access to SmartSimple, and the grantee's agency contacts are up to date

#### GPD liaisons and VISN Network Homeless Coordinators (NHC)

- The GPD liaison is the local VAMC point of contact responsible for the oversight and monitoring of GPD grants, and confirming <u>Veteran eligibility</u> for GPD services
- NHCs may also be involved with areas of grant compliance and operations
  - GPD liaisons must also work through their local VAMC supervisors
- Grantees who need assistance in connecting with their liaison may contact the GPD National Program Office (GPDGrants@va.gov)

#### Funding & Budgetary Considerations

- SN and TIP grants draw funds through the <u>Health and Human Services</u> system
- PDO funds are allocated directly to VAMCs and vouchers are used for billing
- o SN and TIP awards are fixed amounts, meaning each drawn comes from a total funding amount

#### • Grant Objectives and Descriptions

- Grantees must meet the objectives for the target populations in the <u>notice of funding opportunity</u> (NOFO) under which they applied
- o <u>PDO grants have bed models</u>, each with unique performance targets
- o <u>SN grants serve special populations</u>, each with unique performance targets
- <u>TIP grants aim to secure permanent housing for Veterans</u> and have project-specific performance targets

#### Federal Regulations & VHA Directive 1162.01

- Grantees and liaisons must have a thorough understanding of all federal regulations applicable to GPD
  - 38 CFR 61 sets forth GPD-specific regulations
    - Links to the current regulations are available on the GPD website
    - eCFR link: <a href="https://ecfr.federalregister.gov/current/title-38/chapter-l/part-61">https://ecfr.federalregister.gov/current/title-38/chapter-l/part-61</a>
- VA staff should also fully read <u>VHA Directive 1161.01 Grant and Per Diem Program</u>, published November 20, 2020

## • <u>Initial inspections</u> for SN grants and new site locations and <u>annual inspections</u> for PDO grants under option year must occur before December 31, 2021

- SN grantees should connect with liaisons to begin early grant operations
- o TIP units may have special inspection considerations

#### • Operational Considerations

- o Grantees and liaisons should become familiar with the mechanics of normal grant operations
- Homeless Management Information System (HMIS) participation is encouraged
- Per diem payments for Veterans with the care of minor dependents may be available for PDO and TIP grantees

#### Ongoing Grant Compliance & Monitoring

- Grant compliance and ensuring Veteran safety is an ongoing process
- o Inspections of grantee facilities must occur before Veterans may be served
- o Grantees must ensure they file SF-425 annually and when a grant is terminated
- Performance metrics are set for each grant and/or bed model
- Noncompliance with regulations, grant terms, and/or failure to meet performance measures may trigger corrective and/or performance improvement processes

#### • Per Diem Payments and Payment Information

- The Federal Award Identification Number (FAIN) is the number that uniquely identifies a grant award
- o The FAIN must be included on all correspondences with the GPD office

- o Liaisons must ensure accuracy of billing
- o Invoices must include supporting documentation
- o Sample vouchers are on the GPD Provider website
- CARES Act guidance is still in place
- Grantees may have written statements in their grant application that conflict with GPD regulations: The grantee is required to follow the regulatory requirements regardless of any statements in the grant application

We hope this framework will be helpful.

## **Expectations, Operational Framework, and Grant Compliance**

#### **Background and Notices of Funding Opportunities**

PDO and TIP grants became operational in FY 2021. PDO grants are operating in FY 2022 under the first available <u>option year</u>. TIP grants are three-year awards beginning in FY 2021 that will continue through FY 2024 without need for renewal or option years. The original objectives of PDO and TIP grants remain unchanged in this FY. Only SN grants are newly awarded for FY 2022.

The objective of the SN grant is to provide funds to facilitate housing stabilization for special need populations (chronically mentally ill, frail elderly, individuals who care for minor dependents, terminally ill, or women) of Veterans who are homeless or at risk of becoming homeless. SN grantees must provide GPD-served Veterans with private rooms with private bathrooms.

Original NOFOs for all grants are available on the GPD Provider webpage.

#### Operational Framework & Expectations for GPD Grant Recipients

GPD grantees are responsible for following all requirements listed in the notice of funding opportunity (a.k.a. NOFO or NOFA) under which they applied. Links to all applicable regulations and copies of PDO, SN, and TIP NsOFO are available on the GPD website. To provide homeless services consistently across the country, there are many expectations of grant recipients. In general, grant recipients are expected to operate within the GPD framework in the following ways:

- Provide all staffing and services in accordance with the terms of the grant at locations accessible to homeless Veterans
  - SN grant recipients must offer spaces with private beds and baths in FY 2022
  - PDO and TIP grantees must continue to conform to their FY 2021 grant terms and any previously approved changes of scope
    - PDO grantees receiving capital grant funding in FY 2022 must ultimately conform to the conditions of the capital grant
    - Please refer to the capital grant recipient guide on the GPD Provider page
- Establish grant and fiscal accounting procedures compliant with all applicable federal and local regulations
- Understand and monitor allowable grant costs as stipulated by Office of Management and Budget (OMB) Uniform Guidance for Grants (2 CFR part 230), the GPD National Program Office, and/or 38 CFR 61.66 (also see the GPD fiscal website: <a href="https://www.va.gov/HOMELESS/GPD\_Fiscal.asp">https://www.va.gov/HOMELESS/GPD\_Fiscal.asp</a>)
  - It is the GPD grantee's responsibility to ensure that all operational costs assigned to the grant are allowable and charged in accordance with GPD Program Regulations and the applicable Uniform Guidance
  - Grantees must ensure accurate and timely completion of the <u>Federal Financial Report (FFR) SF</u>
     425
  - Grantees must monitor their allowable costs monthly to ensure their per diem rate remains accurate. If costs change, grantees are required to <u>submit an updated per diem</u> rate
- Ensure all grantee contacts are up to date in the GPD electronic grants management system,
   SmartSimple

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- Visit the <u>GPD Provider Website</u> monthly for program updates
- Attend monthly GPD webinars and technical assistance trainings
  - For GPD grantees: Monthly grantee webinars are scheduled on the second Tuesday of each month at 2pm Eastern
    - A calendar invitation with the meeting information will be sent to the designated GPD grantee's point of contact
    - The GPD National Program Office expects a representative from the grantee's agency to attend each month
  - For VA staff: Monthly webinars internal to VA employees are scheduled on the second Wednesday of each month at 1pm Eastern
    - Please ask the GPD National Program Office for a calendar invitation
    - The GPD National Program Office expects VA GPD liaisons to attend monthly
    - NHCs and other VA Homeless Programs staff are welcome to attend
- Follow all requirements listed in the NOFO under which the grantee applied
  - o Links to all applicable regulations are available on our website
- Ensure all dwellings pass applicable inspections
  - It is important to note that GPD rules and regulations require that projects adhere to the Life Safety Code of the National Fire Protection Act, as well as other federal, local, or state codes/laws
  - At times, these codes may conflict
    - More rigorous federal laws and regulations usually take supremacy to less stringent state and local laws
    - If state or local codes are more stringent than the federal requirement, they usually must be followed
    - Consult with the GPD National Program Office as needed
- Complete and participate in quarterly reviews and prepare grant-related activities reports as required in 38 CFR 61.80
  - The GPD liaison will provide grantees with reviews of performance on the VA metrics at least quarterly
  - Meet with the GPD liaison to review these data and discuss any program changes or adjustments to meet the established metrics
  - Identify administrative and programmatic problems which may affect performance and suggest proposed solutions
- Report prior to any program changes as required in 38 CFR 61.62:
  - Receive written approval for significant changes (<u>change of scope/site</u>) in key staff positions and/or grant terms from the GPD National Program Office

#### **Roles of the GPD Liaison**

GPD liaisons from the local VAMC monitor the administration of GPD-funded grants. The GPD liaison is the key link between grantees and the GPD National Program Office. Liaisons will facilitate the initial inspection, annual inspection, quarterly reviews, and be responsible for grant oversight. There are minimum standards of oversight the liaison will facilitate:

- Coordinating and conducting initial inspections required before Veterans can be served in a grantee's facility
- Coordinating and conducting annual reinspections
- Verifying Veteran status and eligibility
- Verifying admission and discharge dates for billing purposes
- Collecting and submitting Veteran data as outlined by program evaluation procedures
- Providing oversight of the care of the grantee's participants
- Performing quarterly reviews and submitting quarterly technical performance reports
- Monitoring the care in and assessing the compliance of the grantee as it aligns with the original grant application
- Intervening to improve compliance or enforce operational corrections when appropriate

**Grantees are primarily responsibility for Veteran care**. Grantees must provide care as prescribed in the original grant proposal or as authorized through any approved changes of scope. Other responsibilities and requirements as listed in 38 CFR § 61.80 should also be reviewed.

## **SmartSimple**

In FY 2022, the GPD National Program Office is using SmartSimple for electronic grant submissions and ongoing grant management. It is critically important that grantee staff have access to SmartSimple, and the grantee's agency contacts are up to date. Vital information from the GPD National Program Office will be relayed to grantees through the SmartSimple system. Grantees will only be able to properly interface with SmartSimple if their points of contact are entered correctly and maintained as staffing changes. It is the grantee's responsibility to maintain current and accurate contacts in SmartSimple. The GPD National Program Office expects to introduce more features in SmartSimple throughout FY 2022. Information and training about the SmartSimple system is available on the GPD Provider website.

## **Funding Information (SN & TIP Only)**

Health and Human Services, Division of Payment Management System

Newly awarded SN grantees should ensure they are able to access the HHS system. SN and TIP payments are paid by the GPD National Program Office through the Health and Human Services (HHS) Division of Payment Management System (DPM). To request new access to the Payment Management System, please visit the GPD Fiscal page to find the correct link: <a href="https://www.va.gov/HOMELESS/GPD\_Fiscal.asp">https://www.va.gov/HOMELESS/GPD\_Fiscal.asp</a>

Grantees should ensure that, in October 2021, they have an active HHS DPM account. Capital payments are paid by the GPD National Program Office through the HHS DPM system. To request new access to the Payment Management System, please visit the GPD Fiscal webpage to find the correct link to HHS.

For new users to the Payment Management System, follow the instructions for requesting access at https://pms.psc.gov/grant-recipients/access-newuser.html

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For users that already have access to the Payment Management System and need to add the new grant, please log into the Payment Management System, and enter the request to update access. The instructions can be found at the following URL: <a href="https://pms.psc.gov/grantors/access-changes.html">https://pms.psc.gov/grantors/access-changes.html</a>

If an agency needs its Payee Account Number during the registration process, please email GPDFiscal@va.gov with the project's FAIN.

## **Initial Inspections & Grant Activation**

Inspection procedures are comprehensive reviews informed by GPD regulations. Generally before grantees can admit (and receive payment for) Veterans, an initial inspection of the grantee's GPD facilities is required. Recurring annual inspections in FY 2022 are to occur yearly thereafter between September 1<sup>st</sup> and December 31<sup>st</sup>.

When initial inspections are completed for new grantees and/or new residential locations, signed by the local VAMC director, and sent to the GPD National Program Office, the GPD National Program Office will confirm receipt and send written notification to the liaison and/or NHC that the grantee's grant is activated and ready to serve Veterans.

In FY 2022, all SN grant facilities will require an initial inspection because they are newly awarded grants and were not inspected in FY 2021. Please contact the GPD National Program Office with questions about SN inspections for FY 2022. In FY 2022, PDO grant locations that were fully inspected (and activated) will require an annual reinspection prior to December 31, 2021.

Virtual inspection modalities are allowed this FY if the local VAMC Director approves of virtual inspections. Liaisons should review VA GPD inspection practices and ensure use of VA-approved virtual technology. For inspection criteria, please review 38 CFR 61.80. PDO, SN, and TIP all follow the same GPD inspection packet procedures.

*Note:* It is essential that all areas of the Life Safety Code of the National Fire Protection Act (NFPA) are met. Liaisons must ensure that the designated facilities inspector sign the appropriate NFPA checklist (determined by the inspector based on applicable codes and building type) and include a copy of the checklist in the completed inspection packet.

Please refer to the <u>annual inspection and reviews section</u> for inspection guidance unique to TIP models.

The team for all inspections—both initial and annual—will be coordinated by the GPD liaison and include

- The Network Homeless Coordinator or designee,
- the VA GPD liaison,
- Personnel from the local VAMC, including subject matter experts from
  - Social Work Service and/or Mental Health and Behavioral Sciences
  - Nutrition and Food Service
  - Contracting Service,
  - Nursing,
  - Facilities Management/Engineering, and
  - VA Security Service.

## **Operational Considerations**

#### **Veteran Eligibility**

GPD grantees may receive per diem payments for homeless Veterans for whom VA authorized the provision of PDO, SN, and TIP supportive housing or supportive services. The local VAMC health care eligibility and enrollment team will make the ultimate determination on a Veteran's eligibility for GPD services, even if a grantee has used SQUARES to initially confirm Veteran status. The GPD National Program Office recommends that GPD liaisons share the following framework with their local VA enrollment office when trying to determine eligibility. The GPD National Program Office cannot determine Veteran eligibility.

Generally within GPD, "Veteran" means anyone discharged or released from active service—regardless of length of service—excluding anyone who received a dishonorable discharge or was discharged though a general court-martial. A bad conduct discharge can result from a general court-martial or a special court-martial. Anyone with a bad conduct discharge from a general court-martial is <u>ineligible</u>; anyone with a bad conduct discharge from a special court-martial is <u>eligible</u>. The length of service restrictions under 38 U.S.C. 5303A do not apply.

#### Eligible for GPD

- Honorable discharge
- General discharge
- Other-than-honorable discharge
- Bad conduct discharge from a special court-martial
  - If a Veteran has documentation that a bad conduct discharge was from a special court martial, s/he would be considered eligible for GPD; otherwise, the GPD grantee would not be able to receive per diem payment for this Veteran until the type of discharge is confirmed
  - This information is not listed on a <u>DD-214</u>, but sometimes, VBA Offices may have the information

#### Ineligible for GPD

- Dishonorable discharge
- Bad conduct discharge from a general court-martial (see P.L. 114-315; 38 USC 2002(b))

How to Determine GPD Eligibility

The best way to determine GPD eligibility is to work through the local VA Medical Center health care eligibility and enrollment team and ask if the

- "...person served in the active military, naval, or air service, regardless of length of service, and who discharged or released therefrom;" and has a discharge of
  - Honorable;
  - General:
  - Other-than-honorable;

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- Bad conduct from a special court-martial<sup>1</sup>; or
- Uncharacterized.

P.L. 114-315 also expanded the definition of "homeless" for purposes of eligibility for participation in the GPD program to include "any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions in the individual's or family's current housing situation, including where the health and safety of children are jeopardized, and who have no other residence and lack the resources or support networks to obtain other permanent housings." (P.L. 114-315; 38 USC 2002(a); 42 USC 11302(a) and (b))

#### **SQUARES**

The GPD grantee may preliminarily verify Veteran eligibility for the GPD Program by asking the GPD liaison to check eligibility and/or by utilizing <u>SQUARES</u>.

Accessing SQUARES requires permission and a greater level of review. Community users must verify their identity. Community organizations serving Veterans will need to apply for SQUARES access. Each organization must designate a SQUARES manager. The SQUARES manager is responsible for reviewing and approving user access within the grantee's organization. If a grantee is having trouble verifying a Veteran's GPD eligibility, the grantee's staff may ask the Veteran for her/his records. If there are questions about SQUARES, please refer to this website: <a href="https://www.va.gov/homeless/squares/">https://www.va.gov/homeless/squares/</a>. Additionally grantees may contact <a href="mailto:SQUARESAdmin@va.gov">SQUARESAdmin@va.gov</a> for technical assistance.

If using SQUARES, grantees are expected to keep a copy of the eligibility confirmation from SQUARES in the Veteran's case file. The grantee must make eligibility information and the Veteran case file available to the liaison during the quarterly review, annual inspection, or upon request.

Although grantees may use SQUARES to determine preliminary eligibility, they should also help Veterans obtain copies of their DD-214s and retain copies in individual case files.

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<sup>&</sup>lt;sup>1</sup> The person must be able to substantiate the bad conduct discharge was from a special court martial; otherwise the person is not eligible for GPD. This information is not on a DD-214. In limited instances regional Veterans Benefit Administration offices may have court-martial information.

#### **Change of Scope/Site Requests**

Any significant alteration in an awarded grant requires a change of scope which must be approved in writing by the GPD National Program Office before it can be implemented. Proposed reductions in service are not acceptable rationale for a change in scope. Please note, the GPD National Program Office will also consider whether the grant application would have scored as well in the year it was funded if the proposed change of scope is approved.

A change of site is a request to provide services described in the grant application at a different or additional location. Changes of site follow the change of scope approval process. If a site change is approved by the GPD National Program Office, the new site <u>must pass GPD inspection</u> by the local VAMC prior to placement of Veterans.

Changes of scope must be submitted to the GPD National Program Office (through <a href="mailto:GPDGrants@va.gov">GPDGrants@va.gov</a>) by the grantee with the liaison's approval, or by the liaison and/or NHC directly. Changes of scope should be discussed with the GPD liaison and the VAMC prior to submission to the GPD National Program Office.

Examples of modifications that require a change of scope request:

- Changes in services provided
- Changes in staffing (including credentialing or educational requirements)
- Changes in admission or discharge criteria
- Changes in population served

One of the most common change of scope request received asks to alter staffing. A best practice for this type of request is for the grantee to use Track Changes on the staffing table originally submitted with the initial grant application. Please see this example:

Job Title	Brief Description of responsibilities [1 to 2 sentences]	Education level	Hours per week allocated to GPD project	Amount of annual salary allocated to the GPD project
Veterans Services Supervisor	Supervision Support     ISP file reviews     Coaching	Bachelor's Degree with one year working with homeless populations / three years' experience with one year being a case manager.	10	11,250
Residential Advocate	Program support     Milieu management     Basic needs advocacy	High School Diploma / Bachelor's Degree	160	150,393
Case manager	Housing search and rapid placement     Barrier mitigation     Goal setting and planning     service navigation     Appointment     accompaniment	Bachelor's Degree/Three Years Case Management Experience	<del>60</del> 80	<del>62,902</del> 83,869
Peer support specialist	Resource and service     navigation     Appointment     accompaniment	Peer-Support-Specialist Certificate	40	29,123
Employment specialist	Direct job placement     Resume building and interview skill building	Bachelor's Degree	32	25,280
<u>Program</u> manager	Program oversight     Staff supervision     Community engagement	Bachelor's Degree / Master's Degree	20	29,925
Custodian	<ul> <li>Basic cleaning and facility maintenance</li> </ul>	High School Diploma	20	17,455
Wellness and Peer Support Access Specialist	Recovery support groups     Service brokerage     Resource and Service     Navigation     Appointment     Accompaniment	CADC / QMHA / QHMP Peer Support Specialist Certificate	<del>16</del> 40	<del>17,235</del> 43,087

Figure 1: Change of scope staffing table example

Short, 15-minute recorded presentations for grantees and liaisons on changes of scope are available. GPD liaisons should refer to the internal-to-VA SharePoint. Grantees may view the change of scope recorded presentation from the February 9, 2021 operational webinar, available on the GPD Provider website.

#### **Award Period & Option Years**

The award period is stated in the grant agreement. In general, PDO awards are for one year, but have subsequent "option years" that may allow for the grant to be authorized for up to two additional years. SN grants are three-year grants with no option years. TIP grants are three-year awards with no option years.

#### As of FY 2022

- PDO awards are in the first option year,
- SN grants are in the first-of-three year, and
- TIP grants are in the second-of-three year.

#### Flexing of Beds between Models (PDO Only)

PDO grantees with <u>multiple bed models</u> are allowed, without a change of scope, to flex beds between the grantee's models under the same VAMC catchment area.

As stipulated in the PDO NOFO, this flex may be up to five beds per grant award (*i.e.* five beds per FAIN). Successful applicants who seek a greater number of flex beds than what is allowed must receive prior written approval from the GPD National Program Office.

## Homeless Management Information System (HMIS)

<u>HMIS</u> is a locally administered web-based data system used to record and analyze both program and client information at the local Continuum of Care level. It is used by federal partners, including VA, to measure project performance and participate in benchmarking of the national effort to end homelessness. Currently, using HMIS is optional for GPD grantees, but highly encouraged.

The applicable fees associated with HMIS are eligible costs for GPD awards. In 2021, P.L. 116-315 stipulated that GPD grantees may be reimbursed for reasonable amounts of HMIS-associated costs under certain conditions. GPD sets the limit for this amount at \$10,000 per grant. For many grantees, HMIS-associated costs can be calculated within the per diem rate limits. For others, whose necessary and reasonable HMIS-associated whose costs exceed the per diem rate limit in effect at the time, an amount that does not exceed \$10,000 per grant may be requested beyond the per diem limit.

More information about HMIS is available on the GPD Provider website.

## **Veterans with Minor Dependents**

In 2021, P.L. 116-315 authorized GPD PDO and TIP grantees to receive per diem payments for Veterans with the care of minor dependents. Grantees interested in applying for per diem payments to serve Veterans with minors must complete a special change of scope package. All information about this process and its associated documents are available on the GPD Provider website. SN grant recipients are not eligible to apply to serve Veterans with minors through this change of scope process.

#### **Suicide Prevention**

Suicide prevention is an urgent priority and suicide safety plans are expected to be in place among all grant recipients. At each VAMC, there is a <u>suicide prevention program</u> and a designated Suicide Prevention Coordinator. Each grantee should have a suicide prevention plan in place to assist Veterans in crisis. VA GPD

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liaisons can help provide the necessary VAMC contacts and information. The Veterans Crisis Line can also provide immediate assistance by calling **1-800-273-8255**. Additionally, the Veterans Crisis Line offers online chat and text options. Please visit <a href="https://www.veteranscrisisline.net/">https://www.veteranscrisisline.net/</a> for more information and options for hard-of-hearing Veterans.

#### **Racial Equity**

Black, Indigenous, People of Color are overrepresented in the homeless system as a proportion of their populations. The GPD National Program Office encourages grantees to recognize racial disparities and work towards creating a culture of racial equity.

FY 2021 PDO and FY 2022 SN grant applications contained a section outlining the grantee's plan to focus on culturally competent staff development. Training activities should be developed to assist grantee staff with providing relevant services to Veterans impacted by racial inequity. If grantees have any concerns or questions about implementing a racial equity staff development plan, please reach out to the GPD liaison.

You may find the following resources helpful:

National Alliance to End Homelessness: Racial Equity Network Toolkit

HUD Exchange: Racial Equity Resources

## **Ongoing Grant Compliance & Monitoring**

#### **Annual Inspections & Reviews**

Recurring annual inspections are to occur yearly after initial inspection between—for FY 2022—September 1<sup>st</sup> and December 31<sup>st</sup>. For inspection criteria please review 38 CFR 61.80. Annual inspections follow the same inspection processes and packets as <u>initial inspections</u>.

Scheduling of all inspections will be coordinated locally between the GPD grantee and VA Medical Center. Outcomes of inspections will be recorded in reports. Any deficiencies will be noted and recorded in the report, and corrective actions will be monitored by the VAMC. When initial and annual inspections are complete, grantees will receive a copy of the inspection report.

*Note:* It is essential that all areas of the Life Safety Code of the National Fire Protection Act (NFPA) are met. Liaisons must ensure that the designated facilities inspector sign the appropriate NFPA checklist (determined by the inspector based on applicable codes) and include a copy of the checklist in the completed inspection packet.

The GPD National Program Office or VA GPD liaison may conduct unannounced site visits of GPD grantees at any time. GPD liaisons will also conduct quarterly environmental reviews and arrange for twice-a-year unannounced nutrition inspections. These twice-a-year unannounced nutrition inspections are to ensure the quality of food services and are *in addition to* the scheduled annual nutrition inspection. Liaisons should also conduct an environment of care review while on site. Outcomes of all reviews will be recorded and stored in the liaison's administrative records once per quarter at a minimum. Liaisons must ensure they follow the updated framework in VHA Directive 1162.01 Grant and Per Diem Program, issued in November 2021.

#### TIP Inspection Considerations

TIP inspections may not necessarily follow the same annual cycle that PDO and SN facilities do. All new TIP units do require <u>initial inspection</u> and activation. TIP units offered by grantees need to be initially inspected as they become available and a Veteran is ready to move in; but, ideally, the Veteran will assume the inspected unit as her/his permanent residence within 6-12 months and the unit will no longer require VA inspection. Beginning FY 2022 (October 1, 2021), prior TIP inspection flexibility is rescinded, and the GPD National Program Office expects that full TIP inspections are conducted for any new unit, in addition to annual inspections.

In the circumstance where a Veteran moves out of a TIP unit without assuming a lease, or a TIP unit is located here is some general guidance for FY 2022. Please ask the GPD National Program Office any supplemental questions.

Several TIP units in one multiunit building

Beginning FY 2022 (October 1, 2021), prior TIP inspection flexibility is rescinded, and the GPD National Program Office expects that full TIP inspections are conducted for any new unit, in addition to annual inspections.

If a Veteran leaves an inspected TIP unit without assuming the lease

If the TIP unit was fully inspected during the FY, it may not require a full reinspection were a Veteran to exit *very shortly* after entering it. The VA liaison should perform an environment of care inspection before a new Veteran moves in. The liaison should also review with the grantee why the unit did not transfer to the previous Veteran occupant. Please consult with the GPD National Program Office.

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#### If a Veteran is still enrolled in TIP after 12 months

An annual reinspection of the unit may be required if the Veteran will be in TIP unit for over 12 months. (TIP targets enrollments of 6-12 months, and the grantee should work with the Veteran towards meeting this time frame.) If, however, there is a plan for the Veteran to assume the unit imminently (e.g. in month 13), an annual inspection may not be required. Liaisons should coordinate with the GPD National Program office as needed.

#### **Grant & Financial Compliance**

All Grant and Per Diem grant recipients are subject to audits to ensure regulatory compliance. Grantees and liaisons working closely with the GPD National Program Office can help to clarify operational roles and address any problems before they become issues of noncompliance. A few points:

- Grant compliance is assessed through various mechanisms, and grantees and liaisons should be familiar with all applicable areas
  - Applicable federal regulations (e.g. 38 CFR 61; OMB Uniform Guidance for Grants (2 CFR part 230, etc.)
  - The original NOFO under which the grantee applied
  - The grantee's grant application and approved changes of scope
  - Applicable VA Directives and guidance (e.g. <u>VHA Directive 1162.01 Grant and Per Diem Program</u>)
  - o Any federal legislation that enacts program changes before federal regulations are updated
    - The GPD National Program Office will keep all informed of any legislative changes
- Approval of per diem payments does not constitute approval of individual costs charged as part of the payment
  - If VA subsequently determines through a fiscal review or audit that costs were not charged appropriately, VA may issue a Notice of Indebtedness to collect for the over-billing
  - Submission of budgets or other information as part of the grant application or through subsequent changes of scope does not constitute approval for charges that violate program regulations or Uniform Guidance
  - o Grantees must track costs by FAIN and each FAIN will have its own per diem rate
  - o Grantees must meet the requirements of 38 CFR 61.66
- Fiscal reporting is based on the federal fiscal year; October 1 to September 30
  - All grantees are required to complete the FFR SF 425 on an annual basis for each FAIN
  - Annual FFRs are due no later than 90 days after the end of the federal FY (September 30)
    - Grantees email SF 425s to GPD425@va.gov
  - If the GPD grantee withdraws from the grant or is terminated, a final FFR will be due
    - The final FFR is due no later than 120 days after the date of withdrawal or termination
    - If the grantee's agency has overages, DO NOT include a check with the FFR
    - If the FFR indicates funding is due to be returned, our office will initiate a formal Notice of Indebtedness with instructions on how and where to send payment or request waivers of debt

It is very important that if no one in the grantee's agency has expertise in meeting federal grant compliance requirements, professional grant management services are retained.

#### **Performance Metrics**

VA has established performance metrics for the various GPD transitional housing models. Please also see the following:

- PDO Models Required Minimum Performance Metrics
  - Service Center Performance Metrics
- SN Required Minimum Performance Metrics
- TIP Required Minimum Performance Metrics

GPD liaisons will receive VA performance metric information monthly and will share this outcome information with GPD grantees. The recipient and the GPD liaison will assess the performance of the project based on these metric results at least quarterly.

The following information provides the technical description of each of the GPD performance metrics. The success of GPD grantees will be measured on one or more of the following performance measures as outlined in the applicable NOFO.

GPD Metric 1: Discharges to Permanent Housing

**Definition**: Percentage of Veterans exiting GPD to permanent housing

**Inclusions:** Veterans who exit directly to permanent housing upon leaving the GPD.

**Exclusions for GPD Metrics 1, 2, & 3:** Veterans will be excluded from these measures under any of the following circumstances:

- Veteran has a Length of Stay (LOS) of 7 days or less
- Veteran is ineligible for VA health care (an official application for Veterans Health Administration health care must be processed for this exclusion to occur)
- Veteran is deceased at discharge
- Veteran is placed into a hospital or other residential non-psychiatric medical facility, longterm care facility or nursing home, or psychiatric hospital or other psychiatric facility (this does not include other residential treatment programs)
- Veterans who have been discharged from GPD programming due to threatened/actual violence to self or others
- Veteran is transferred to another residential program due to the temporary or permanent suspension of program operations. This exclusion will be entered manually after consultation with the GPD National Program Office

GPD Metric 2: Negative Exits

**Definition:** Percentage of Veterans being asked to leave the GPD or leaving without consulting staff (a.k.a. 'going AWOL')

**Inclusions:** Number of exits from GPD programming for a violation of program rules, failure to comply with program requirements, or leaving the program without consulting staff.

Exclusions: Veterans will be excluded from the measure if

• Any of the above exclusions listed in GPD Metric 1.

GPD Metric 3: Employment at Exit

**Definition:** Percentage of Veterans exiting GPD with competitive employment.

**Inclusions:** Number of exits in which the Veteran indicated a positive employment status.

Exclusions: Veterans will be excluded from the measure if

- Any of the above exclusions listed in GPD Metric 1, and
- Veterans who are disabled/retired, students, or indicate exit to an unpaid volunteer position are excluded from the denominator.

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#### Performance Improvement Plan (PIP)

In July 2021, changes to <u>38 CFR 61.80</u> (the Final Rule) introduced PIPs. PIPs aim to proactively address issues meeting grant performance targets. If VA determines that a grantee deviates more than five percent from established GPD performance goals for any two consecutive quarters as defined in 38 CFR 61.80(c)(3)(A)(i) through (iv), the recipient will submit a PIP to the GPD liaison within 60 calendar days.

Conversations about performance metrics and negative discharges should be regular and ongoing between grantee and liaison. In some cases (*e.g.* for awards with only five beds), a PIP may not be warranted if the grantee and liaison are communicating closely. Grantees and liaisons should work closely to help optimize performance.

In some cases, PIPs may lead to progressive sanctions like CAPs. Grantees and liaisons should thoroughly review <u>61.80 for greater clarity about the PIP process</u>. Although the ongoing COVID-19 pandemic may alter performance reporting, liaisons should be regularly communicating with grantees about their performance.

## **Corrective Action Plan (CAP)**

The process of corrective action is detailed extensively in <a href="VHA Directive 1162.01">VHA Directive 1162.01</a> Grant and Per Diem</a>
Program. Liaisons should follow this process when working with grantees. However, corrective action involves due process, and grantees and liaisons should work closely and proactively to resolve any issues requiring correction before a formal process is needed.

A CAP is a formal letter signed by the VAMC director outlining the deficiency that is not meeting grant requirements, inspection standards, or other issues related to the environment of care and/or Veteran safety. The CAP will clearly state the deficiency or deficiencies and allow the grantee time—typically 30 days—to perform remediation. If there is an immediate threat to Veteran safety, a CAP letter does not need to be in place to remove Veterans from the premises. Please consult with VHA Directive 1162.01 Grant and Per Diem Program for greater detail.

Grantees should not be surprised by nor be unaware of an impending CAP letter. The liaison should clearly discuss any findings at once upon discovery and provide the grantee the opportunity for correction. Quarterly reviews lend themselves to discussion of any grant compliance or performance issues. Grantees should include their leadership in the discussions.

Progressive sanctions, *e.g.* suspension of per diem payments, termination of the grant, are possible. Please refer to VHA Directive 1162.01 Grant and Per Diem Program for a full description of consequences of failure to remediate issues noted in CAP letters.

When a CAP is considered successfully remediated, the VAMC director will sign another letter noting the issue is resolved.

## **Special Reporting Circumstances**

Sentinel or critical events may occur and require additional reporting actions to the VA GPD liaison. Some examples include Veteran injury, overdose, death, or damage to the grantee's facility where Veterans reside. Grantees should have an internal incident reporting system and must ensure that these incident reports are provided to the GPD liaison within 24 hours. If liaisons are not being informed by the grantee of critical issues affecting Veterans or the grantee's facilities, the liaison may conduct unannounced inspections and/or request a written communication plan.

## **Allegations of Impropriety**

All allegations of impropriety will be immediately addressed and documented through use of the appropriate VA mechanism, (e.g., VA Patient Representative, Quality Management, Board of Inquiry, Office of the Inspector General). This is paramount for the health and safety of the Veterans served. As a condition of the grant award, grantees must cooperate with these inquires.

## **Per Diem Payments and Payment Information**

#### Federal Award Identification Number (FAIN)

FAINs are assigned by the GPD National Program office. It is essential that the GPD grantee's unique FAIN is included on any correspondence or documents sent to the GPD National Program Office. Please include all dashes and zeros.

In FY 2022, all grantees will have one FAIN for all per diem bed models at a specific VA medical center. PDO or TIP grants operating under an option year, the FAIN ending in -21 will remain the same. For newly awarded SN grants, the FAIN will end in -22.

The FAIN for each application is broken into six parts which uniquely identify each award. Below is an example FAIN to better understand the numbering convention.

<b>Example FAIN:</b> ABCD222-0999-544-SN-22				
Unique Agency Identifier	Project Number	VA Station Number	Grant Type (Per Diem)	Year of Initial Award
ABCD222	0999	544	SN	22

#### **Funds Allocation**

Become familiar with the agency's Data Universal Numbering System (DUNS) and Employer Identification Number (EIN) numbers to the GPD grantee will use to receive payments from VA. When billing VA, the GPD grantee must use the same DUNS/EIN combination used to apply for the grant. Grantees may not bill VA for services using any other DUNS/EIN numbers. If a grantee needs to change its DUNS number, they must request the change from the GPD National Program Office, and the alteration must be approved in writing. Changing an EIN constitutes a legal transfer of the grant, even if the original agency still is running the grant. Per diem funds may only paid to the appropriate vendor account associated with the DUNS/EIN indicated by the grantee on their Application for Federal Assistance (SF-424).

NOTE: Anticipated in April 2022, the federal government will move away from DUNS/EIN to a Unique Entity Identifier (UEI) that will be generated by the System for Award Management (SAM). No action is needed by grantees. More information can be found on <a href="https://www.SAM.gov">www.SAM.gov</a> and on <a href="https://www.GSA.gov">www.GSA.gov</a>.

#### **Per Diem Rates**

Grantee can find instructions on how to calculate and request a per diem rate on the GPD Provider website. The current FY 2022 State Home Domiciliary per diem rate is. However, P.L. 116-315 placed a cap on per diem rates of up to three times the State Home Domiciliary rate during the COVID-19 public health emergency, subject to funding availability and authorization by the Secretary of Veterans Affairs. When funding is no longer available to support enhanced per diem rates, and/or the Secretary of Veterans Affairs rescinds the waiver, per diem rates will automatically revert to the maximum authorized rate or a lower rate per the grantee's request. Per diem rate guidance is available on our GPD Provider webpage under the Per Diem Rate Resource section.

#### **Per Diem Action Sheet**

The GPD National Program Office will notify grantees and liaisons of the project's date of activation and/or of any approved per diem rate changes. The GPD National Program Office sends email correspondence that will indicate the activation date of the project, approved per diem rate, and approved number of beds. In the future, this may be done through the electronic grants management system. There is no guarantee of reimbursement

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by VA if grantees place Veterans in their facilities prior to official communications from the GPD National Program Office.

## **Vouchers for Payment**

Monthly, the awardee will summarize the billing information using the Per Diem Payment Voucher Form and submit it with their detailed daily census to the GPD VA liaison for verification and signature. These invoices for services rendered must be accurate and there must be supporting evidence documenting the Veterans served daily for GPD liaison review.

PDO and TIP awards will also have special vouchers for grantees approved to serve and bill for Veterans with the care of minor dependents.

Copies of applicable FY 2022 vouchers are available on the GPD Provider website under the Fiscal Resources section.

#### **Billing and Payments: Per Diem Only**

In FY 2022, the Tungsten Network is the billing system used for PDO grants. (Please refer to the <u>HHS system</u> for SN and TIP.) Answers to frequently asked questions about Tungsten are available on the GPD Provider page under Fiscal resources. Billing is for services rendered, and grantees may draw funds monthly. Draw requests will be verified by the GPD liaison and finally approved for payment at the local VAMC.

Grantees must provide documentation to their liaison every month:

- 1. PDO Payment Voucher Form: This is the summary billing information for the bed days of care or service center visits provided each month
- 2. Detailed Daily Census: This is a monthly listing of Veterans by individual names or identifiers indicating the days present during the month and adjusted for any absences (Note: some grantees use an Excel spreadsheet to capture these data). This also must be used for Special Need.

For transitional housing, billing will be based on bed days of care multiplied by the established per diem rate. Per diem payment is for services and housing by day so you must—at a minimum—provide an invoice reflecting which Veterans receive which services on which days. Any additional documentation needed for billing will depend upon the grantee's business rules and the sophistication of the record keeping system. Liaisons should periodically verify invoices by reviewing supporting documentation in the grantee's administrative file or other documents proving the Veteran's presence in the program.

For service centers, billing will be based on each hour of service provided. Grantees must maintain documentation on the Veteran served, the period services were rendered, and which services were generally provided. This daily sign-in log must be provided to the GPD liaison as supporting documentation for your monthly per diem billings.

## Billing and Payments: Special Need and Transition in Place

SN and TIP awardees should submit monthly billing draw requests in the <a href="https://example.com/HHS system">HHS system</a> after the voucher has been certified and approved by their GPD liaison. The voucher must be emailed to GPDVouchers@va.gov Either the GPD liaison or the grantee may submit the voucher when it is fully signed.

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## **CARES Act Special Guidance & Flexibilities**

As of August 2021, this guidance is still in effect.

Effective March 27, 2020, the Coronavirus Aid, Relief, and Economic Security (CARES) Act (P.L. 116-136) stipulated that VA GPD

- 1. shall waive any requirement to discharge a veteran from the grant and per diem program of the Veterans Health Administration after the veteran is absent for 14 days, and
- 2. may continue to pay per diem to grant recipients and eligible entities under the program for any additional days of absence when a veteran has already been absent for more than 72 hours.

In response to the enactment of the CARES Act, the GPD Program is making temporary modifications to its discharge and per diem payment policies. Please visit the GPD Provider website, the Coronavirus (COVID-19) section for specific and timely guidance and for more information on how the CARES Act impacts absences and billing.

Only the Secretary of Health and Human Services can declare an end to the public health emergency. When the emergency is declared over, the GPD National Program Office will provide guidance. All 38 CFR 61 regulations applicable to discharges and lengths

GPD grantees and liaisons should work closely to avoid discharging Veterans to the streets or unsafe conditions. Lengths of stay greater than two years or number of care episodes should not be reasons to discharge Veterans or deny access to services. Strong coordination and flexibility are required to ensure safe and appropriate housing options are available for Veterans, especially during the COVID-19 public health emergency.

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## Per Diem Only Model-Specific Descriptions & Targets

#### **Bridge Housing**

Targeted Population: Homeless Veterans that have been offered and accepted a permanent housing intervention [e.g., Supportive Services for Veterans Families (SSVF), Department of Housing and Urban Development-VA Supportive Housing (HUD–VASH), Housing Coalition/ Continuum of Care (CoC)]; and are not able to immediately enter the permanent housing.

*Model Overview*: Bridge housing is intended to be a short-term stay in transitional housing for Veterans with pre-identified permanent housing destinations.

Characteristics & Standards Goals in the Individual Service Plan should be short-term with the focus on the move to permanent housing, rather than the completion of treatment goals. Veterans are expected to receive case management and support, which should be coordinated with the HUD–VASH, SSVF, or other available community-based programs. Grantees will assist Veterans with accessing services as needed/requested by the Veteran and must make available to participants a menu of available services. Length of Stay (LOS) will be individually determined based on need, but in general, is not expected to exceed 90 days.

Admission Criteria: Veterans must have been offered and accepted a permanent housing intervention prior to admission or within the first 14 days of admission.

Required Minimum Performance Metrics/Targets

- Discharge to permanent housing is 75 percent
- Negative exits<sup>2</sup> target is less than 20 percent

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<sup>&</sup>lt;sup>2</sup> The term "negative exit" is defined as the removal of a Veteran from the GPD program because of a violation of program rules, a failure to comply with program requirements, and/or leaving the program without consulting GPD grantee staff (a.k.a. "going AWOL," elopement, etc.). Additionally, VA may, at its discretion, update these targets at any point during the award period. If any new targets come into effect, VA will notify grantees in writing.

#### **Clinical Treatment**

Targeted Population: Homeless Veterans with a specific diagnosis related to a substance-use disorder and/or mental-health diagnosis; Veteran actively chooses to engage in clinical services.

*Model Overview*: Clinically focused treatment provided in conjunction with services effective in helping homeless Veterans secure permanent housing and increase income through benefits and/or employment.

Characteristics & Standards: Although the programming and services have a strong clinical focus, permanent housing and increased income are a required outcome of the program. Treatment programs must incorporate strategies to increase income and housing attainment services; Individualized assessment, services, and treatment plan which are tailored to achieve optimal results in a time efficient manner and are consistent with sound clinical practice; Program stays are to be individualized based upon the individual service plan for the Veteran (not program driven); Staff are to be licensed and/or credentialed for the substance -use disorder (SUD)/mental health (MH) services provided; and treatments services must be provided by the app licant or through contract arrangement (VA staff cannot not be the treatment provider for this model). Veterans are offered a variety of treatment service modalities (e.g., individual and group counseling/therapy, family support groups/family therapy, and psychoeducation).

Required Minimum Performance Metrics/Targets

- Discharge to permanent housing is 65 percent
- Employment of individuals at discharge is 55 percent
- Negative exits<sup>3</sup> are less than 20 percent

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The term "negative exit" is defined as the removal of a Veteran from the GPD program because of a violation of program rules, a failure to comply with program requirements, and/or leaving the program without consulting GPD grantee staff (a.k.a. "going AWOL," elopement, etc.). Additionally, VA may, at its discretion, update these targets at any point during the award period. If any new targets come into effect, VA will notify grantees in writing.

#### **Hospital to Housing (Respite Care)**

Targeted Population: Homeless Veterans identified and evaluated in emergency departments and inpatient care settings for suitability for direct transfer to a designated GPD Program for transitional housing and supportive care.

*Model Overview*: Respite care is a medical model to address the housing and recuperative care needs of homeless Veterans who have been hospitalized.

Characteristics & Standards: Housing sites are expected to be in close proximity to the referring medical center, so that ongoing clinical care, including specialty care, can continue to be provided; Have a post-discharge care plan as pre-requisite to program placement that addresses ongoing physical, mental health, substance use disorder, and social work needs as well as care management plans to transition the Veteran to permanent housing upon clinical stabilization; The VA Homeless Patient Aligned Care Team (H–PACT), or other appropriate care unit, will facilitate and coordinate the ongoing care needs upon transition.

A Memorandum of Understanding must be in place with the local VAMC that details participation in the Hospital-to-Home (H2H) program. Included in this should be a detailing of acceptance criteria for Veterans being referred from local facility emergency departments and inpatient wards, a detailing of how follow-up care with the medical center is organized, and a commitment to engaging enrolled Veterans in permanent housing as part of program objectives;

Admission Criteria: Individual must be functional, be able to perform independent Activities of Daily Living (ADL); not require acute detox, has no apparent psychosis; and has a post discharge plan coordinating care with the medical center (e.g., H–PACT Team, Mental Health, Substance Abuse, etc.).

Required Minimum Performance Metrics/Targets

- Discharge to permanent housing is 65 percent
- Negative exits<sup>4</sup> are less than 20 percent

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<sup>&</sup>lt;sup>4</sup> The term "negative exit" is defined as the removal of a Veteran from the GPD program because of a violation of program rules, a failure to comply with program requirements, and/or leaving the program without consulting GPD grantee staff (a.k.a. "going AWOL," elopement, etc.). Additionally, VA may, at its discretion, update these targets at any point during the award period. If any new targets come into effect, VA will notify grantees in writing.

#### **Low Demand**

Targeted Population: Chronically homeless Veterans who suffer from mental-health or substance- use problems, or who struggle with maintaining sobriety; and Veterans with multiple treatment failures that may have never received treatment services or may have been unsuccessful in traditional housing programs. These Veterans may have not yet fully committed to sobriety and treatment.

Model Overview: Low-Demand housing is a program design using a low-demand/harm-reduction model to better accommodate chronically homeless Veterans, and Veterans who were unsuccessful in traditional treatment settings. Programming does not require sobriety or compliance with mental health treatment as a condition of admission or continued stay. Overall, demands are kept to a minimum; however, services are available as needed. The goal is to establish permanent housing in the community, while providing for the safety of staff and residents.

Characteristics & Standards: Project is small (typically, 20 beds or less); Services must include case management, substance-use, and mental-health treatment; and referrals for benefits are made available as Veterans engage; Must provide the participant an orientation that sets the expectations of performance for the participant; Must have 24/7, on-site staffing at the same location as the location of the program participant. (Use of resident managers is not allowed); Must have a method to monitor participants and their guests' comings and goings; Must have a system in place for the management of the introduction of contraband; Must be willing to retain Veterans who commit minor infractions of rules and who cannot and/or will not stop drinking and/or using legal or illegal substances; Must be committed to keeping the Veterans housed and staying continuously engaged with each Veteran and provide services as needed; Must have procedures to ensure safety of staff and residents; and the grantee agency must participate in bi-monthly calls and an annual fidelity assessment process as established by VA.

Required Minimum Performance Metrics/Targets

- Discharge to permanent housing is 60 percent
- Negative exits<sup>5</sup> are less than 20 percent

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The term "negative exit" is defined as the removal of a Veteran from the GPD program because of a violation of program rules, a failure to comply with program requirements, and/or leaving the program without consulting GPD grantee staff (a.k.a. "going AWOL," elopement, etc.). Additionally, VA may, at its discretion, update these targets at any point during the award period. If any new targets come into effect, VA will notify grantees in writing.

## **Service-Intensive Transitional Housing**

*Targeted Population*: Homeless Veterans who choose a supportive transitional housing environment providing services prior to entering permanent housing.

*Model Overview*: Provides transitional housing and a milieu of services that facilitate individual stabilization and movement to permanent housing as rapidly as clinically appropriate.

Characteristics & Standards: Scope of services should incorporate tactics to increase the Veteran's income through employment and/or benefits and obtaining permanent housing. Services provided and strategies used by the applicant will vary based on the individualized needs of the Veteran and resources available in the community. Applicant specifies the staffing levels and range of services to be provided.

Required Minimum Performance Metrics/Targets

- Discharge to permanent housing is 70 percent
- Employment of individuals at discharge is 55 percent
- Negative exits<sup>6</sup> are less than 20 percent

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<sup>&</sup>lt;sup>6</sup> The term "negative exit" is defined as the removal of a Veteran from the GPD program because of a violation of program rules, a failure to comply with program requirements, and/or leaving the program without consulting GPD grantee staff (a.k.a. "going AWOL," elopement, etc.). Additionally, VA may, at its discretion, update these targets at any point during the award period. If any new targets come into effect, VA will notify grantees in writing.

#### **Service Centers**

*Targeted Population*: Homeless Veterans who are seeking assistance with obtaining housing, employment, medical care, or benefits.

*Model Overview*: Provides services and information to engage and aid homeless Veterans obtain housing and services.

Characteristics & Standards: Scope of services should incorporate tactics to engage and aid the Veteran. Services provided and strategies used by the applicant will vary based on the individualized needs of the Veteran and resources available in the community. Applicant specifies the staffing levels and range of services to be provided.

A service center's success is based on engagement with the population to be served and the demon strated ability to provide services that lead to meeting the populations' needs. As such service centers performance, will be reviewed as follows:

Required Minimum Performance Metrics/Targets

- Serve the homeless Veteran population as described in the application
- Provide the services as outlined in the application
- Meet the requirements of 38 CFR 61.80 regarding service centers
- Demonstrate the service center is meeting the number of visits as stated in the application

## **Special Need Descriptions & Targets**

#### **Overall Objective**

The objective of SN grantees is to **facilitate housing stabilization within private rooms with private bathrooms for special need populations** of Veterans who are homeless or at risk of becoming homeless. As applicable, each grantee's performance will be indicated by how population-specific targets are met.

Depending on which special population(s) the grantee promised to serve through the original grant application, performance targets may include permanent housing, negative exits and/or employment. The overall grantee's performance will be determined by how the targets are met on average across all applicable areas.

#### **Population Definitions**

Title 38 CFR part 61 and Title 2 CFR part 200 contain definitions of populations relevant to SN grant awards.

- Chronically mentally ill: A condition of schizophrenia or major affective disorder (including bipolar disorder) or posttraumatic stress disorder (PTSD), based on a diagnosis from a licensed mental health professional, with at least one documented hospitalization for this condition sometime in the last 2 years or with documentation of a formal assessment on a standardized scale of any serious symptomatology or serious impairment in the areas of work, family relations, thinking or mood.
- **Frail elderly**: 65 years of age or older with one or more chronic health problems and limitations in performing one or more activities of daily living (such as bathing, toileting, transferring from bed to chair, etc.).
- **Terminally ill:** A prognosis of 9 months or less to live, based on a written medical diagnosis from a physician.

VA may, at its discretion, update population-based performance targets during any future year, for example during an option year renewal process as applicable. Any new targets will be stated in a new or revised grant agreement. Please see performance targets below. Please note, a **negative exit** is defined as *exits from a GPD program for a violation of program rules, failure to comply with program requirements or leaving the program without consulting staff.* 

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#### **Chronically Mentally III Objectives**

- Help participants join in and engage with the community
- Facilitate reintegration with the community and provide services that may optimize reintegration such as life skills education, recreational activities and follow up case management
- Ensure that participants have opportunities and services for reestablishing relationships with family
- Ensure adequate supervision, including supervision of medication and monitoring of medication compliance
- Provide opportunities for participants, either directly or through referral, to obtain other services
  particularly relevant for a chronically mentally ill population, such as vocational development, benefits
  management, fiduciary or money management services, medication compliance and medication
  education

Required Minimum Performance Metrics/Targets

- Discharge to permanent housing target is 60%
- Employment of individuals at discharge target is 55%
- Negative exits target is less than 20%

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## **Frail Elderly Objectives**

- Ensure the safety of the residents in the facility to include preventing harm and exploitation
- Ensure opportunities to keep residents mentally and physically agile to the fullest extent through the
  incorporation of structured activities, physical activity, and plans for social engagement within the
  program and in the community
- Provide opportunities for participants to address life transitional issues and separation and/or loss issues
- Provide access to walkers, grippers, or other assistance devices necessary for optimal functioning
- Ensure adequate supervision, including supervision of medication and monitoring of medication compliance
- Provide opportunities for participants either directly or through referral for other services particularly relevant for the frail elderly, including services or programs addressing emotional, social, spiritual, and generative needs

Required Minimum Performance Metrics/Targets

- Discharge to permanent housing target is 65%
- Negative exits target is less than 20%

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#### **Individuals Caring for Minor Dependents Objective**

- Ensure transportation for individuals who care for minor dependents, and their children, especially for health care and educational needs
- Provide directly or offer referrals for adequate and safe childcare
- Ensure children's health care needs are met, especially age appropriate wellness visits and immunizations
- Address safety and security issues including segregation from other program participants if deemed appropriate

Required Minimum Performance Metrics/Targets

- Discharge to permanent housing target is 70%
- Employment of individuals at discharge target is 55%
- Negative exits target is less than 20%

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#### **Terminally III Objectives**

- Help participants address life transition and life-end issues
- Ensure that participants are afforded timely access to relevant services (e.g., hospice services, nursing services, palliative care)
- Provide opportunities for participants to engage in activities of "getting things in order" or other therapeutic actions that help resolve end of life issues and enable transition and closure
- Ensure adequate supervision including supervision of medication and monitoring of medication compliance
- Provide opportunities for participants either directly or through referral for other services particularly relevant for terminally ill such as legal counsel and pain management.

Required Minimum Performance Metrics/Targets

• There are no minimum required performance targets recorded for this SN population.

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## **Women Objectives**

- Ensure transportation for women, especially for health care and educational needs
- Address safety and security issues including segregation from other program participants if deemed appropriate.

Required Minimum Performance Metrics/Targets

- Discharge to permanent housing target is 70%
- Employment of individuals at discharge target is 55%
- Negative exits target is less than 20%

## **Transition in Place Description & Targets**

#### **Overall Objective**

Provides transitional housing and robust services that facilitate individual stabilization, increased income, and promote the ability of the Veteran to assume occupancy of the TIP residence as permanent housing as rapidly as clinically appropriate.

#### **Target Population**

Homeless Veterans who choose a supportive transitional housing environment providing services prior to entering permanent housing

### **Characteristics & Standards**

The TIP housing model offers Veteran residents housing in which support services transition out of the residence over time, rather than the resident leaving the residence. The TIP housing models offers transition and stabilization services to Veterans in independent apartments. The eventual goal for Veterans in TIP is to assume occupancy of the unit after they stabilize and no longer need support. This leaves the Veteran in place and not forced to find other housing while still stabilizing from the preceding period of homelessness. It is expected that Veterans will receive transition in place supportive services for approximately 6 to 12 months before assuming permanent occupancy of the unit. Any extension beyond 12 months requires prior written approval from the GPD liaison. Extensions are then considered in increments of up to 90 days, and generally are not to exceed an additional 12 months of services (*i.e.* the combined total of TIP services is up to 24 months per Veteran).

The TIP model does not support

- Discharge planning to HUD-VASH, nor
- Discharge planning to Supportive Services for Veteran Families (SSVF) Rapid Rehousing.

Scope of services should strive to

- increase the Veteran's income through employment and/or benefits; and
- secure apartment/permanent housing in the Veteran's name.

GPD providers will tailor services and strategies to the individualized needs of the Veteran and resources available in the community.

Housing case management should incorporate several elements leading to successful permanent housing:

- Approaches that are flexible in intensity, support client choice, use a strengths-based approach, and focus on housing retention
- Approaches that encourage the Veteran's household to develop, enhance, or reengage a network of support that will continue after the Veteran finishes TIP
- Build tenancy skills such as how to resolve conflicts, how to understand a lease, options, working through crises and other skills that will assist Veterans in retaining housing

GPD grantees specify the staffing levels and range of services to be provided, which are expected to be multidisciplinary and robust. GPD providers also identify or convert existing suitable apartment-style housing. Grantees are expected to replace units as they are converted to permanent housing to maintain the average number of bed days as stated in the application during the entire grant period. Once the Veteran assumes the

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lease or other long-term agreement, VA will no longer provide funding for the unit under this NOFA. For example, each time a Veteran assumes the lease or other long-term agreement for the apartment, the grantee must identify a new unit in which to place another Veteran. By program design, transition to permanent housing should occur as rapidly as possible, and grantees should continually be acquiring and coordinating with VA on the inspection of new units to maintain a steady number of Veterans served. Grantees must own or lease apartments intended as permanent housing for an individual or single family.

Apartments must meet the inspection standards outlined at title 38 Code of Federal Regulations (CFR) 61.80, and have the following characteristics:

- 1. Private access without unauthorized passage through another dwelling unit or private property
- 2. Sanitary facilities within the unit
- 3. Basic furnishings
- 4. Suitable space and equipment within the unit to store, prepare, and serve food in a sanitary manner (including, at a minimum, a refrigerator, freezer, sink, and stove)

Note: Microwave ovens, hot plates, or similar items are not suitable substitutes for an operational stove

Required Minimum Performance Metrics/Targets

- Discharge to permanent housing is **75 percent**
- Employment of individuals at discharge is 55 percent
- Negative exits<sup>7</sup> are less than 20 percent

Participant Lease Agreement Information

Lease Guarantors—A Lease Guarantor is a third party (in this case, the grantee) who guarantees to pay the lease costs if the lessee (in this case, the Veteran) defaults. This is not allowed under this program.

Sublease—The sublease is a lease by a lessee (in this case, the grantee) to a third party (in this case, the Veteran) conveying the leased property for a shorter term than that of the lessee, who retains a reversion in the lease. For the sake of clarity, in a sublease TIP housing scenario, the landlord is the lessor, the grantee is the lessee, and the Veteran is the sublessee.

GPD TIP grantees may use subleases during the transitional housing phase if the sublease has been approved by the GPD National Program Office, and the sublease meets the following conditions:

- 1. Period of sublease must be less than the entire period of the grantee's lease with the landlord
- 2. Grantee lease renewal must be taken into consideration when stating the period of the sublease
- 3. Sublease must be explicit that the grantee is the lessee, not the Veteran
- 4. Sublease must revert to the grantee lessee without sanctions to the Veteran should the Veteran leave prior to program completion and lease assumption
- 5. Sublease may not contain requirements contrary to GPD regulations
- 6. Security deposits may not be charged to Veterans. However, grantee lessees may take other available and appropriate legal steps in situations of property destruction

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The term "negative exit" is defined as the removal of a Veteran from the GPD program because of a violation of program rules, a fail ure to comply with program requirements, and/or leaving the program without consulting GPD grantee staff (a.k.a. "going AWOL," elopement, etc.). Additionally, VA may, at its discretion, update these targets at any point during the award period. If any new targets come into effect, VA will notify grantees in writing.